WILLKIE FARR & GALLAGHER

April 13, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: Application for Consent to the Transfer of Control of Licenses and Section 214
        Authorizations from Sprint Corporation to MCI WorldCom, Inc.

        CC Docket No. 99-333

Dear Ms. Salas:

On behalf of Sprint Corporation and pursuant to the Staff's request, attached is a copy of
Sprint's Bi-Lateral Peering Policy. Please do not hesitate to telephone me at (202) 429-4787 if you
have any questions regarding this submission. Thank you.

An original and one copy of this letter is submitted herewith in accordance with Section
1.1206(b) of the Commission's rules.

Respectfully submitted,

Michael G. Jones

Enclosure

cc: Michelle Carey
        Claudia Fox
        Christopher Libertelli

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≡Sprint.

SPRINT'S BI-LATERAL PEERING POLICY[1] (Effective February 8, 2000)

Sprint will consider bi-lateral peering with companies with IP networks exhibiting the following characteristics:

1. Size of the Network: The peering network must be a Global Network Provider operating an international IP network with nodes in major metropolitan areas in the U.S. and Europe.

2. U.S. Domestic Backbone Capacity: The peering network must have OC-48 or greater active Internet bandwidth between 10 or more U.S. cities. These requirements may change as Sprint's predominant backbone capacity changes.

3. International Backbone Capacity: The peering network must have OC-12 or greater active Internet bandwidth between U.S. and Europe. These requirements may change as Sprint's predominant international capacity changes.

4. Total Ingress/Egress Traffic: The average monthly traffic exchange between Sprint and the peering network must be justifiable. All traffic exchanged must originate from, and terminate to, the same Autonomous System (AS#). The average monthly traffic volume is time sensitive and hence, Sprint will use the traffic conditions prevailing at the time of measurement as a benchmark for evaluation purposes.

5. Peering Capability: The peering network must be able to support clear channel OC-48 peering arrangements at 4 (four) geographically diverse domestic U.S. locations. Such support arrangements will include, but not be limited to the following:

   a) Announce the same routes at all interconnection points and only the routes of peer's respective customers;
   b) Connect with sufficient bandwidth to handle projected load;
   c) Agree to resolve connectivity issues within a predefined timeframe such that in the event of congestion, both parties will improve the connectivity by adding more bandwidth at the affected site, or by adding connectivity at another site to reduce reliance on the affected site; and,
   d) The peering network must have the ability to handle all outages and maintenance schedules at the private peering points with a fully functional 24 x 7 operations center.

Sprint will continue to monitor the market and traffic conditions and accordingly change the peering policy to suit the market and customer needs.

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[1]This Policy may be modified, replaced or discontinued by Sprint at any time and is within Sprint's sole discretion. Any such decision made by Sprint concerning such Policy will be final, binding and conclusive.

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